

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VASEK POSPISIL, NICHOLAS KYRGIOS,  
ANASTASIA RODIONOVA, NICOLE  
MELICHAR-MARTINEZ, SAISAI ZHENG,  
SORANA CÎRSTEĂ, JOHN-PATRICK  
SMITH, NOAH RUBIN, ALDILA SUTJIADI,  
VARVARA GRACHEVA, TENNYS  
SANDGREN, and REILLY OPELKA, on  
behalf of themselves and all others similarly  
situated,

-and-

THE PROFESSIONAL TENNIS PLAYERS  
ASSOCIATION,

Plaintiffs,

v.

ATP TOUR, INC., WTA TOUR, INC.,  
INTERNATIONAL TENNIS FEDERATION  
LTD., and INTERNATIONAL TENNIS  
INTEGRITY AGENCY LTD.,

Defendants.

Case No. 1:25-cv-02207-MMG

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF LAWRENCE E. BUTERMAN IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS**

I, Lawrence E. Buterman, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of Latham and Watkins, 1271 Avenue of the Americas, New York, New York, (202) 906-1200, and counsel to Defendant WTA Tour, Inc., (WTA) in this action.

2. As a member in good standing in this Court and in the Bar of the state of New York, I submit this Declaration in support of Defendants' Motion to Dismiss The Professional Tennis Players Association (the "PTPA"). I have personal knowledge of the facts set forth herein and, if called upon to do so, I can and will testify competently thereto.

3. Attached hereto as Exhibit A are excerpts of a transcript of a hearing that took place in this case on April 11, 2025.

4. Attached hereto as Exhibit B is a PDF of the "FAQ" page on the PTPA's website, accessed on May 19, 2025 via the link <https://www.ptpaplayers.com/faqs/>.

5. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 20, 2025.

Dated: May 20, 2025  
New York, New York

/s/ Lawrence E. Buterman  
Lawrence E. Buterman